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**Hearing date: March 4, 2014**  
**Hearing time: 10:30 a.m.**  
**Objections due: February 25, 2014**

*Attorneys for non-party Edward Arrigoni*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re:

OTR MEDIA GROUP, INC.,

Debtor,

Chapter 11

Case No. 1-11-47385 (ESS)

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OTR MEDIA GROUP, INC., 203 17TH REALTY LLC,  
SAKELE BROTHERS, LLC *and* ONE MAIDEN LANE  
REALTY, LLC, *all New York limited liability companies*,  
848 FULTON REALTY CORP. *and* MING SHENG INC.,  
*New York corporations*, GOTHAM BROAD, LLC, *a*  
*Delaware limited liability company*, FOTINI  
THEOHARIDU, *and* PHILLIPE JOCELINE, *natural*  
*persons*,

Adv. Pro. No. 1-11-01448 (ESS)

Plaintiffs,

- vs. -

The CITY OF NEW YORK,

Defendant.

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**NOTICE OF MOTION BY NON-PARTY EDWARD F. ARRIGONI TO RE-OPEN  
ADVERSARY PROCEEDING AND FOR SANCTIONS**

**PLEASE TAKE NOTICE** that, upon the annexed declarations of Donald E. Watnick,  
Esq. and Edward Saviano, Esq., non-party Edward F. Arrigoni, by and through its counsel  
Donald E. Watnick, Esq., will move this Court on March 4, 2013 at 10:30 a.m. at the United

States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York, in Courtroom 3585, or as soon thereafter as counsel may be heard, for an Order, pursuant to Fed. R. Bankr. R. 5010 and 7026, Fed. R. Civ.P. Rule 45(d)(3), 28 U.S.C. §1927 and E.D.N.Y. LBR 7007-1 and 9013-1, (i) to re-open Adv. Pro. No. 1-11-01448 (ESS) to grant the relief requested in this motion<sup>1</sup>, and (ii) to grant sanctions against Debtor and its counsel of record in this case and award Mr. Arrigoni attorneys' fees, and for such other and further relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the relief sought in the Motion shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and shall be filed with the Bankruptcy Court electronically in accordance with General Order #462, by registered users of the Bankruptcy Court's case filing system (with a hard copy delivered directly to chambers), and served upon the undersigned so as to be received no later than seven days before the return date of this motion, pursuant to E.D.N.Y LBR 9006-1.

Dated: New York, New York  
February 6, 2014

LAW OFFICES OF DONALD WATNICK

By: /s/ Donald E. Watnick  
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*Attorneys for Movant Edward F. Arrigoni*

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<sup>1</sup> This adversary proceeding and bankruptcy previously were assigned to Judge Elizabeth S. Stong; the adversary proceeding was closed on January 9, 2014. The bankruptcy case was closed on January 27, 2014.